

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)
PENSION PLAN,)
Plaintiffs,) CIVIL ACTION
vs.) NO. 20 C 1064
R & I ORNAMENTAL IRON, INC.,)
an Illinois corporation,) JUDGE HARRY D. LEINENWEBER
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, R & I ORNAMENTAL IRON, INC., an Illinois corporation, in the total amount of \$31,840.80, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,335.00.

On February 24, 2020, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Raul Sandoval, Employee) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on March 16, 2020. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2572
Facsimile: (312) 236-0241
Email: pryan@baumsigman.com

R&MIDJR & I Ornamental Iron\motion for entry of default and judgment.pnr.dfl.wpd

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m., this 24th day of July 2020:

Mr. Raul Valdez, President
R & I Ornamental Iron, Inc.
96 Center Drive
Gilberts, IL 60136-9712

Ms. Olga G. Valdez, Registered Agent
R & I Ornamental Iron, Inc.
902 E. Red Oak
Addison, IL 60101-6010

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for the Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6278364
Telephone: (312) 216-2573
Facsimile: (312) 236-0241
E-Mail: pryan@baumsigman.com